

**BEFORE THE ZONING COMMISSION  
FOR THE DISTRICT OF COLUMBIA**

**HANOVER REED STREET**

**Lots 82, 846, 856, and 859 in Square 3846  
Lots 38, 825, 829, 832, 833, and 834 in Square 3841**

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**Application for a Consolidated Planned Unit Development and  
Related Zoning Map Amendment**

**PREHEARING SUBMISSION**

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**April 8, 2022**

Submitted by:

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**CERTIFICATION OF COMPLIANCE**  
**WITH SUBTITLE Z § 401 OF THE ZONING REGULATIONS**

Pursuant to Subtitle Z § 401.4, the undersigned, on behalf of Hanover R.S. Limited Partnership, certifies that this Supplemental Filing in support of Z.C. Case No. 22-04 complies with the provisions of Subtitle Z § 401.1 of the 2016 Zoning Regulations of the District of Columbia, as set forth below. In accordance with Subtitle Z §401.5, the application shall not be modified less than twenty (20) days prior to the public hearing.

<b><u>Subtitle Z Subsection</u></b>	<b><u>Description</u></b>	<b><u>Page / Tab</u></b>
401.1(a)	Information requested by the Zoning Commission and the Office of Planning	Submitted herewith
401.1(b)	List of witnesses prepared to testify on the Applicant's behalf	Pg. 9 / Tab C
401.1(c)	Written summary of testimony of all witnesses and resumes of expert witnesses	Tab D
401.1(d)	Additional information introduced by Applicant	Submitted herewith
401.1(e)	Reduced plan sheets	None
401.1(f)	List of maps, plans, or other documents readily available that may be offered into evidence	Tab E
401.1(g)	Estimated time required for presentation of Applicant's case	Tab B
401.3(a)	Names and addresses of owners of all property within 200 feet of the PUD site	Tab F
401.3(b)	Names and addresses of each person having a lease with the owner for all or part of any building located on the property involved in the application	Tab G
401.8	Transportation memorandum prepared by Applicant's traffic consultant	To be submitted no later than 30 days prior to the hearing

Respectfully submitted,



Christopher S. Cohen  
Holland & Knight LLP

### **List of Exhibits**

<b><u>Description</u></b>	<b><u>Tab</u></b>
Updated Architectural Drawings (the "Updated Plans")	A
IZ Unit Location Plans	B
List of witnesses prepared to testify on the Applicant's behalf and Estimated Time Required for Presentation of Applicant's Case	C
Outlines of Testimony for Witnesses and Resumes of Expert Witnesses	D
List of maps, plans, or other documents readily available that may be offered into evidence	E
List of names and addresses of all owners of property within 200 feet of the PUD Site (plus two sets of mailing labels submitted separately)	F
Names and Addresses of Each Person Having a Lease with the Owner for Property Included with the PUD Site	G
Greater Brookland Intergenerational Village Contribution and Support Letter	H
Mint Project Contribution and Support Letter	I
FreshFarms Contribution and Support Letter	J
Village of Brookland Traditional Schools Contribution and Support Letters <i>(executed in counterparts)</i>	K
Hearing Fee Calculator Form 116	L

## I. INTRODUCTION

### A. Project Overview

This Prehearing Statement and accompanying documents (the “Prehearing Submission”) are submitted by Hanover R.S. Limited Partnership (the “Applicant”) in support of its application to the Zoning Commission for the District of Columbia (the “Commission”) for approval of a consolidated planned unit development (“PUD”) and a related Zoning Map amendment. This Prehearing Submission is submitted in accordance with Subtitle Z § 401 of the Zoning Regulations of the District of Columbia, 11 DCMR (September 2016), as amended (the “Zoning Regulations”).

The property that is the subject of this application includes Lots 82, 846, 856, and 859 in Square 3846 and Lots 38, 825, 829, 832, 833, and 834 in Square 3841 (collectively, the “PUD Site”). As further detailed below, the PUD Site has a total land area of approximately 156,361 square feet.<sup>1</sup> The PUD Site is located on the south side of Franklin Street, NE, bounded by the Washington Metropolitan Area Transit Authority tracks to the west and a north-south public alley on the east (which is located to the west of 10th Street, NE). Several alleys traverse through the PUD Site.

The Applicant proposes to construct a mixed-use development in two phases with Reed Street (Alley)<sup>2</sup> being realigned<sup>3</sup> to bifurcate the overall project and extend to Franklin Street. The overall project will provide approximately 683 new residential units between two phases with approximately 18,000 square feet of ground floor PDR/makerspace (the “Project”). As shown on the Sheet A12 of the Updated Plans as well as the IZ Unit Location Plans included at Tab B, the Project includes a significant affordable housing proffer (15% of the total residential gross floor area (“GFA”)) at varying levels of affordability. Other benefits proposed with the Project include significant improvements to the surrounding infrastructure and streetscape as well as various contributions to various community organizations. *See* Ex. 3K – 3M and Tabs H – K.

The PUD Site is currently zoned Production, Distribution, and Repair (PDR)-2. *See* Ex. 3D. Under the PUD, the western and southern portion of the PUD Site – i.e., generally Lots 82, 825, 832, 846, and 856 as well as the closed public street and closed public alleys – will be rezoned to the Mixed Use (MU)-6A zone district, and the northeastern corner of the PUD Site – i.e., generally Lots 38, 829, 833, and 834 as well as the closed public alleys – will be rezoned to the MU-4 zone district. *See* Ex. 3E. The zone boundary line will extend down the center of the

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<sup>1</sup> As detailed further below in Section III of this Prehearing Statement, the total land area comprising the PUD Site has decreased slightly due to the calculation of additional land area that will be dedicated to the District for sidewalk purposes abutting Lot 859 and additional calculations of the resulting land area by the Office of the Surveyor for the District of Columbia (“Office of the Surveyor”). *Infra*, Fn. 3.

<sup>2</sup> This portion of Reed Street, NE has been and will continue to be a public alley, although it will be improved to street standards as approved by the District of Department Transportation (“DDOT”). It is referred to herein as “Reed Street” despite its technical classification of an Alley.

<sup>3</sup> The Applicant has an application pending with the Office of the Surveyor that seeks to close portions of the alley system in Square 3841 and 3846 as well as a 10-foot portion of the south side of Franklin Street. This application also includes dedications of land to effectuate the proposed realignment of Reed Street. This application is referred to herein as the “Alley Closing and Dedication Application.”

realigned Reed Street to the intersection with the east-west public alley to the east of Reed Street. Lot 859 in Square 3846 is currently zoned MU-6B, and no zone change is proposed for that portion of the PUD Site.

## **B. Application History and Request for Public Hearing**

The Application was filed with the Zoning Commission on January 21, 2022. *See* Ex. 1 – 3O. The Office of Planning (“OP”) recommended the Commission set down the application for public hearing in its report dated March 21, 2022 (the “Setdown Report”). *See* Ex. 15. In its Setdown Report, OP stated that “the proposed PUD with related zoning would generally not be inconsistent with the maps and written elements of the Comprehensive Plan.” *Id.* at p. 1.

The Commission considered this case for set down at its March 31, 2022, public meeting and voted (4-0-1) to schedule the case for public hearing. At that meeting, the Commission concurred with the additional information requested by OP in its Setdown Report and also requested additional information regarding the proposed massing and height of the Project, proposed density, and affordable housing proffer, among other things. The Applicant’s responses to the information requested by the Commission and OP are detailed below in Section II.

As demonstrated by the Certification of Compliance above and as set forth below, this Prehearing Submission meets the filing requirements of Subtitle Z § 401. Accordingly, the Applicant requests that the Commission schedule a public hearing for consideration of this application.

## **II. RESPONSE TO COMMENTS FROM THE ZONING COMMISSION AND THE OFFICE OF PLANNING**

Submitted concurrently with this Prehearing Statement are the Updated Plans (Tab A) that show various refinements to the Project and include new information regarding the proposed PUD. Below the Applicant provides responses to specific requests from the Zoning Commission and/or OP.

### **A. Residential Unit Distribution**

As shown on Sheet A12 of the Updated Plans, the Project will provide a mix of studios, one-, two- and three-bedroom units, with nearly 30% of the 683 units being either two- or three-bedroom units. While noted as studios, the size and configuration of the units identified as studios are in fact “junior one-bedroom” units (i.e., with an in-board bedroom in accordance with the Building Code). These units are identified as studios for the purposes of Inclusionary Zoning (“IZ”)<sup>4</sup>.

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<sup>4</sup> *See* 11-C DCMR § 1005.8: “For Inclusionary Developments, a bedroom shall mean a habitable room with immediate access to an exterior window and a closet that is designed as a “bedroom” or “sleeping room” on constructions plans submitted in an application for a building permit.

## B. Affordable Housing

### 1. IZ Location Plans

The Applicant's proposed IZ Location Plans are included at Tab B. As previously noted, the Applicant is committed to providing at least two three-bedroom IZ units – one with each phase of the Project. Each IZ unit will be comparable in exterior design, materials, and finishes as to the market rate units.

### 2. Requested Flexibility

In its original application, the Applicant requested the following flexibility as to the IZ Units:

- To vary the number and mix of inclusionary units if the total number of dwelling units changes within the range of flexibility requested, provided that the location and proportionate mix of the inclusionary units will substantially conform to the layout shown on the Plans[.]

[See Ex. 3 at p. 26.]

In its Setdown Report, OP stated that it did not recommend approval of this flexibility given its concern that such language would allow the IZ proffer to be decreased if the overall GFA decreased. *See* Setdown Report at p. 10. The Commission concurred with that concern.

To clarify, the Applicant's requested IZ flexibility would not have the effect of reducing the amount of affordable housing provided by the Project. Accordingly, the Applicant proposes to refine the proposed IZ flexibility as follows:

- To vary the number and mix of inclusionary units if the total number of dwelling units changes within the range of flexibility requested, **so long as the total square footage reserved for inclusionary units (15% of the residential gross floor area) is not reduced, and** provided that the location and proportionate mix of the inclusionary units will substantially conform to the layout shown on the Plans, **and provided further that there is one three-bedroom unit in Phase I and one three-bedroom unit in Phase II.**

### 3. IZ Plus Comparison

At the public meeting during which the Commission voted to setdown the application, the Commission asked the Applicant to evaluate how the Project's affordable housing component compares to an IZ Plus scenario – i.e., a Zoning Map amendment application that increases the allowable density and triggers IZ pursuant to 11-C DCMR § 1001.2(a)(3). Under the Zoning Regulations, any rezoning of a site from PDR to a MU-zone has an automatic set aside of 20% of the residential GFA for IZ. *See* 11-C DCMR § 1003.4(a). Thus, if the application only requested a map amendment, the set aside would be 20%.

The adoption of the IZ Plus program specifically exempts PUDs from the automatic IZ Plus set aside. This allows the Applicant in the PUD to identify amenities and benefits that are important to the community in addition to the provision of affordable housing. For example, in this project, the proposed affordable housing proffer of 15% is the highest that has been seen in a PUD for an unsubsidized project. In addition to the significant set aside, the Applicant is proffering levels of affordability that are deeper than would be required under an IZ Plus scenario, a commitment to two three-bedroom units (one with each phase of the Project), and numerous other amenities and benefits, including the construction of new infrastructure, incorporation of important environmental features, the creation and support of a farmer's market for the community, and support for many important programs in the community through identified community groups. Furthermore, the community and the District have been able to actively participate in the design of the Project which would not otherwise happen during the map amendment process.

Finally, the Comprehensive Plan Future Land Use Map ("FLUM") designates the west portion of the PUD Site of the PUD Site as Mixed Use (High Density Residential / PDR) and the east portion of the PUD Site as Mixed Use (Moderate Density Residential / PDR). Thus, to achieve consistency with the Comprehensive Plan, any rezoning of the PUD Site would need to enable a certain level of residential density and an appropriate mix of uses that would satisfy the PDR stripe. While the Framework Element identifies the RA-4 and RA-5 Zone Districts as being consistent with the High Density Residential category, and the R-3, RF, and RA-2 Zone Districts as being consistent with the Moderate Density Residential category, those zones do not otherwise permit PDR or commercial uses. Therefore, in order to select a zone that allows uses that satisfy both stripes shown on the FLUM, the Applicant has selected a Mixed Use zone and has proceeded as a PUD as opposed to a Map Amendment application. The Applicant's selection of a Mixed Use zone and use of the PUD process provides a level of certainty that redevelopment of the PUD Site will contain an appropriate amount and type of PDR uses that might otherwise not be provided if the PUD Site was redeveloped under an IZ Plus map amendment.

### **C. Proposed Rezoning and Density**

The Commission asked the Applicant to provide additional justification regarding the proposed rezoning of the western portion of the PUD Site to MU-6A, as well as the proposed density in the West Building, which is 5.23 FAR. The proposed MU-6 zone is the appropriate zone because it allows the necessary height, density, and mix of uses for this Project that has been closely coordinated with the community.

As stated above, the western portion of the PUD Site is designated as Mixed Use (High Density Residential / PDR) on the FLUM. According to the Framework Element, the RA-4 and RA-5 zones are considered to be consistent with the High Density Residential FLUM category. As a matter of right, the RA-5 zone permits a maximum density of 7.2 FAR with IZ and 8.64 FAR for a PUD. However, selection of the RA-5 zone would be inconsistent with the Comprehensive Plan as it does not permit the PDR uses that are called for on the FLUM. In contrast, the proposed MU-6A zone permits the exact mix of uses that the FLUM contemplates for the western portion of the PUD Site, and permits the same exact density as the RA-5 zone. Specifically, the MU-6A zone permits medium- to high-density development and allows up to 6.0 FAR as a matter of right, with up to 7.2 FAR with IZ and 8.64 for a PUD. The maximum permitted height is 90 feet as a matter of right, 100 feet with IZ and 110 feet for a PUD. The project's proposed FAR and height



fit well within those permitted numbers, and the emphasis on residential use in the MU-6A zone is appropriate for the PUD Site. While the MU-5 zone permits medium-density mixed-use development, it does not provide sufficient density for the overall project, although the allowable height under a PUD would be adequate. Although a PUD under the MU-8 zone would allow sufficient density (7.2 FAR) and height (90 feet), the intent of this zone is not appropriate for the PUD Site. As set forth in 11-G DCMR § 400.7(b), the MU-8 zone is intended to “[b]e located in uptown locations, where a large component of development will be office-retail and other non-residential uses[.]” (Emphasis added.) The MU-10 zone permits the same height and density as the MU-6A, but is more commercially focused, as a 3.0 FAR is permitted for non-residential uses. Thus, when comparing the MU-6A zone to other medium-to high-density mixed use zones, it is most appropriate for this PUD Site. *See* 11-G DCMR §§ 400.4 – 400.7; 11-X DCMR §§ 303.3 and 303.7.

Although a PUD in the MU-7 zone would meet the height and density requirements for this project, the Applicant believes that the MU-6A zone is appropriate given the significant amount of MU-6 zoning in the surrounding area and that the height and density proposed fit within the existing context of the recent developments in the area that were developed as a matter of right under the existing MU-6 zone. The height and density of those projects relate well to the proposed construction. The Rowan building is located across Reed Street to the east and has an approximate height of 90 feet with a habitable penthouse above. The Brookland Press building is located immediately to the south of Phase I and has an approximate height of 85 feet.

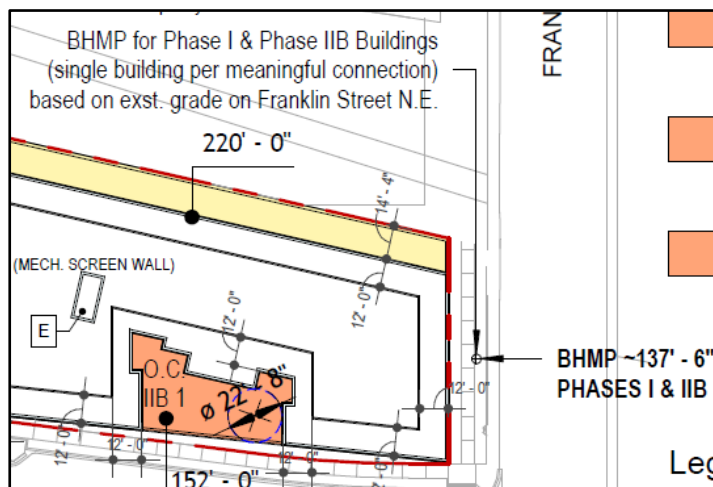
In addition, the height and density of the overall Project has been closely negotiated with the community and has been designed to fit within the surrounding context, which has seen redevelopment in parts in recent years. The community requested that the tallest and most dense portions of the development be aligned with the tracks to the west. Thus, the design team has created a spine along the tracks that creates a new barrier between the tracks and the residential homes to the east. This massing then steps down as the building moves east, including incorporating functional and aesthetically pleasing open spaces for residents and integrating step backs to form a massing that creates an inviting streetscape that is compatible with the lower-scale residential uses to the east along Evarts Street. This articulation of the building has been further reduced the building's density throughout the design process. Furthermore, the Applicant removed a level from the Phase IIA Building in an effort to ensure that the overall project fits within the existing neighborhood.

Finally, the project will be built with non-Type I construction (i.e., stick construction). The Building Code limits the overall height of the project based on an average grade plane height calculation. The height that results from those limitations relates well to the Rowan building and the Brookland Press project, as noted above. Thus, the Applicant believes that the density as proposed addresses the competing priorities that inform the development of the PUD Site and is also "not inconsistent" with its designation for high density residential and PDR uses.

#### **D. Building Height Measuring Point**

At the public meeting the Commission asked for clarity regarding the building height measuring point ("BHMP") for the proposed PUD, and particularly for the West Building. As

noted on Sheet A13 of the Updated Plans and the graphic included, the BHMP for the West Building (i.e., the single building which includes Phase I and Phase IIB) is located at elevation 137'-6" at grade along Franklin Street, NE. Thus, the BHMP is located at a position that is between the face of the West Building and the Franklin Street bridge – not at the higher bridge elevation. The BHMP for the Phase IIA Building is located at elevation 144'-0" and also at grade along Franklin, Street, NE.)



From this BHMP, the zoning height for the West Building is 84 feet, which is below the allowable height that is permitted as a matter-of-right in the MU-6A zone. Franklin Street, NE has a right-of-way width of 90 feet<sup>5</sup>, which permits the maximum proposed height for the Project.

Reed Street slopes downward from Franklin Street, NE towards Evarts Street and further to the south. In the Phase I portion of the West Building, the zoning height is approximately 70 feet, 6 inches to the main roof (and 82 feet, 6 inches to the top of the tower element), as measured from the BHMP. Due to the downward slope of Reed Street, the height of the Phase I portion of the West Building is approximately 87 feet, as measured from the adjacent grade at the southeast corner.

### E. Proposed PDR/Makerspace Size and Uses

OP requested that the Applicant continue to evaluate the PDR space and the types of uses that will be incorporated in the Project. As detailed in its initial submission, the Applicant proposes to dedicate at least 18,000 square feet of GFA to a range of ground-floor PDR/makerspace uses. The Applicant is continuing to develop its program for this space and will coordinate with OP on this matter leading to the public hearing on this application. As the PDR/makerspace proposed with the Project is further refined, the Applicant will provide greater details as to the types of uses envisioned and the associated design of the space that will accommodate such uses. Further, the Applicant will demonstrate how the proposed PDR/makerspace represents a substantial retention as well as revitalization of the industrial-related uses existing at the PUD Site.

### F. Parking

The Applicant has evaluated and refined the parking proposed for the Project, both in response to comments from the community as well as from OP. As indicated on Sheet A11 of the Updated Plans, the amount of parking to be provided with the PUD has been reduced. The number of spaces within the Phase IIA Building garage has been reduced from 49 spaces to 38 spaces. While this

<sup>5</sup> In this location, Franklin Street has a right of way width of 100 feet; however, the right of way width will be reduced to 90 feet as part of the realignment of Reed Street.

building only has one below-grade parking level, this reduction has been achieved by reducing the amount of area that will be excavated in that level. The number of spaces within the Phase IIB Building garage has been reduced from 98 spaces to 87 spaces within the 1.5 levels that are being provided for parking in that building by devoting space to other uses. While the number of parking spaces has not changed in the Phase I Building, this portion of the building devotes only one partial level of the building to parking. Overall, the proposed parking strikes an adequate balance between the amount that is needed to comfortably serve residents, visitors, and patrons of the Project and the PUD Site's transit-oriented location. Further, the installation of the underground parking garages will serve to reduce traffic at the street level and help cultivate a pedestrian-friendly environment.

### **G. Aerial Perspectives**

The Commission requested additional images of the proposed PUD in order to better understand the Project from a holistic perspective and how it would fit in with the surrounding community – i.e., “bird’s eye” views. Accordingly, the Applicant has provided several new contextual aerials, which are available at Sheets A22 – A25 of the Updated Plans.

### **H. Building Color and Materials**

In response to OP's request, expanded detail regarding the proposed building color and materials are provided at Sheets A17 and A18 (Design and Material Precedent Images), Sheet A43 (Phase I Materials), Sheet A53 (Phase IIA Materials), and Sheet A63 (Phase IIB Materials). The Applicant will provide additional information regarding the proposed building color materials during public hearing on this application.

### **I. Signage**

OP requested that the Applicant provide additional information regarding the various building entries, including signage. *See* Setdown Report at p. 1. Initial information regarding signage is provided at Sheets SE01 – SE13 of the Updated Plans. The Applicant will provide further detail regarding the proposed signage prior to public hearing on this application.

### **J. Consistency with the Comprehensive Plan**

Finally, at the public meeting during which the Commission setdown the application for public hearing, the Commission asked for additional insight regarding the PUD's consistency with the Comprehensive Plan, specifically with respect to the racial equity lens through which the Comprehensive Plan evaluation is to be conducted, and the PUD Site's Neighborhood Conservation Area designation on the Generalized Policy Map. In response, the Applicant points to the analysis provided at pages 2 through 6 and pages 8 through 10 in its Comprehensive Plan Evaluation (Ex. 3H), respectively, and the Applicant will provide a thorough summary of its analysis during public hearing.

### III. UPDATED INFORMATION REGARDING APPLICATION

The Applicant highlights the following updates regarding the application:

- PUD Site Land Area.

The land area comprising the overall PUD Site has slightly decreased from 156,653 square feet to 156,361 square feet. Since filing the initial application, the Applicant has included the dedication of additional land area for sidewalk purposes abutting Lot 859, which decreased the land area comprising the Phase I Building site. In addition, the Office of the Surveyor further calculated the overall PUD Site land area as part of the Alley Closing and Dedication Application. With rounding differences, the total land area comprising the PUD Site was further decreased. The updated site areas are reflected on Sheet A11 of the Updated Plans.

- Uses of Special Value to the Neighborhood or the District of Columbia as a whole (11-X DCMR § 305.5(q)).

As detailed in its Statement in Support, as part of its public benefits package, the Applicant is proffering contributions to support specific programs provided by various community organizations. Additional information regarding the programs and services to be provided by the Greater Brookland Intergenerational Village, the Mint Project, Inc., FreshFarms (the anticipated coordinator of the proposed Farmers Market), and the Village of Brookland Traditional Public Schools are included at Tabs H - K.

- Updated Landscape Drawings.

Updated landscape drawings, which include new sections for the Phase I Building courts and the Phase IIB open court, streetscape planting sections, and a lighting plan, are provided at Sheets L1 – L30 of the Updated Plans. The Applicant also specifically points to Sheets L16, L17, and L18, which include additional detail about the design and functionality of the proposed Farmers Market.

- Updated Civil Drawings.

Updated civil drawings, which contain new sheets showing the Applicant's public space plans, including a site plan with dimensions of the street and streetscape (Sheets C04 and C05), as well as a dimensioned street section for Reed Street (Sheet C06) and a stormwater management / green area ratio plan (Sheet C09), are provided at Sheets C1 – C14 of the Updated Plans.

### IV. LIST OF WITNESSES

Pursuant to 11-Z DCMR § 401.1(b), below is a list of those persons the Applicant intends to call as witnesses. *See also* Tab C. Outlines for each witness listed and resumes for those witnesses whom the Applicant intends to proffer as experts are attached hereto at Tab D. Those witness denoted with an asterisk (\*) indicate experts that have previously been qualified by the Commission.

- Dan Gordon, Hanover R.S. Limited Partnership, *on behalf of the Applicant*
- \*Chris Harvey, HCM Architects  
*To be proffered as expert witnesses in architecture and urban design.*
- \*Brandon Robinson, HCM Architects  
*To be proffered as expert witnesses in architecture and urban design.*
- \*Erwin Andres, Gorove/Slade Associates, Inc.  
*To be proffered as expert witness in transportation planning and traffic engineering.*
- \*Michael O’Hara, Bohler Engineering  
*To be proffered as expert witness in civil engineering and site design.*
- \*Aaron Wilke, GWH Landscape Architects  
*To be proffered as expert witness in landscape architecture.*
- Andrea Foss, Steven Winter Associates  
*To be proffered as expert witness in green building and sustainability.*
- Joseph Andracchio, Steven Winter Associates
- \*Shane L. Dettman, Holland & Knight LLP  
*To be proffered as expert witness in land use and urban planning.*

## V. UPDATES ON COMMUNITY OUTREACH

Since filing the initial application on January 21, 2022, the Applicant has continued its engagement efforts with the affected Advisory Neighborhood Commission (“ANC”) 5B and various community stakeholders. A list of additional meetings the Applicant has attended since filing the application and the general purpose of those meetings is provided below:

Date	Description of Meeting
February 3, 2022	Meeting with community members (John Leibovitz and Daniel P. Schramm) to discuss traffic planning and associated concerns.
February 15, 2022	Meeting with immediate community members to discuss solar impacts.
February 16, 2022	Meeting with ANC 5B-03 and ANC 5B-05 single-member districts.
March 26, 2022	Meeting with community members (Hayden Wetzel and Karl Ginter) regarding the Quonset Huts on site.


In addition to the meetings listed above, the Applicant has continued to communicate and engage with members of the ANC, the Brookland Neighborhood Civic Association, and members of the community. The Applicant will continue to work closely with the ANC and the community as the application progresses toward public hearing.

## **VI. CONCLUSION**

This Prehearing Submission, along with the original application, meets the filing requirements for a consolidated PUD and related Zoning Map amendment, as required by Subtitle X, Chapter 3 and Subtitle Z of the Zoning Regulations. For the foregoing reasons, the Applicant respectfully requests that the Zoning Commission schedule a hearing on the application.

Respectfully submitted,

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